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Attorney for Defendant
BACKGROUNDCHECKS.COM, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HUGO BARRAGAN,

Plaintiff,

vs.

EARLY WARNING SERVICES, LLC;
THE RETAIL EQUATION; and
BACKGROUNDCHECKS.COM,

Defendants.

Case No. 2:20-cv-00795-KJD-VCF

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM, LLC TO
FILE RESPONSIVE PLEADING**

[SECOND REQUEST]

Plaintiff HUGO BARRAGAN ("Plaintiff") and Defendant BACKGROUNDCHECKS.COM, LLC ("Defendant"), by and through their undersigned counsel, hereby agree and stipulate to extend the time for Defendant to file a responsive pleading to Plaintiff's Complaint for thirty (30) days from the from the current deadline of June 25, 2020, up to and including **July 27, 2020**.

Pursuant to the inherent delays caused by the current COVID-19 pandemic, Defense counsel has been unable to conduct a complete investigation. The requested extension is necessary for additional time to investigate the allegations in the Complaint and prepare a response to the Complaint.

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1 This is the second request for an extension of time to respond to the Complaint. This request
2 is made in good faith and not for the purpose of delay.

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4 Dated: June 22, 2020

Dated: June 22, 2020

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6 /s/ Matthew I. Knepper

7 DAVID KRIEGER, ESQ.
KRIEGER LAW GROUP, LLC

8 MATTHEW I. KNEPPER, ESQ.
9 MILES N. CLARK, ESQ.
KNEPPER & CLARK LLC

10 Attorneys for Plaintiff
HUGO BARRAGAN

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

Attorney for Defendant
BACKGROUNDCHECKS.COM, LLC

11
12 **IT IS SO ORDERED.**

13 Dated: June 22, 2020.

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16 UNITED STATES MAGISTRATE JUDGE

17 4845-2132-6528.1 107811.1003